

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>MARTA WILLIAMS,</b>	:	
	:	
<b>Plaintiff,</b>	:	
	:	
<b>v.</b>	:	<b>CIVIL ACTION</b>
	:	
<b>ABRAHAM INDUSTRIES, INC., t/db/a</b>	:	<b>No. 02-CV-5240</b>
<b>VALLEY FORGE FLAG, INC., et al.</b>	:	
	:	
<b>Defendants.</b>	:	
	:	

**DEFENDANT MICHAEL LIBERMAN'S  
MOTION TO DISMISS COUNT I OF THE COMPLAINT**

Defendant Michael Liberman, by his attorneys, and pursuant to Fed. R. Civ. P. 12(b)(6), respectfully requests this Court to Dismiss Count I of Plaintiff's Complaint with prejudice as to Michael Liberman for the reasons set forth in the accompanying memorandum of law.

Respectfully submitted,

HOYLE, MORRIS & KERR LLP

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